Florida Department of Environmental Protection

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DRAFT PERMIT

PERMITTEE

Lakeland Animal Nutrition, Inc.
2801 S. Combee Road
Lakeland, FL 33802

Authorized Representative:
Mr. William L. Jackson III, President

Air Permit No. 1050365-006-AC
Permit Expires: 11/20/2013
Site Name : Eaton Park Facility
Minor Air Construction Permit
Project Name: EU No. 004 - Cyclone Replacement

This is the final air construction permit to replace Emission Unit No. 004 – Small Pellet Mill's cyclone used to control particulate matter emissions with a like-kind custom fabricated cyclone. Additionally, this permit contains several administrative changes to Emission Unit Nos. 002 and 004 such as: 1) clarify the production rate as the feed production rate (output) and 2) the feed production rate is considered the same as the process input rate regarding Rule 62-296.320(4)(a), F.A.C. – Process Weight Table. The proposed work will be conducted at the Eaton Park Facility (Standard Industrial Classification No. 2048). The facility is located in Polk County at 2801 S. Combee Road in Lakeland, Florida. The UTM coordinates are Zone 17, 410.65 km East, and 3098.80 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with

the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

DRAFT

_____ _____

Robert C. Wong Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on _____ to the persons listed below.

Mr. Galen (Nick) Nicolette, Vice President
Lakeland Animal Nutrition, Inc.
nick@lanfeeds.com

Mr. Lynn Robinson, P.E.
Southern Environmental Sciences, Inc.
lrobinson@sesfla.com

Ms. Danielle Henry, Southwest District Air Program Compliance Manager
Florida Department of Environmental Protection
Danielle.D.Henry@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

DRAFT

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The facility has two (2) regulated pellet mills and other associated exempt activities as described below.

Raw materials (primarily corn and oats) are received via railcars and trucks; gravity unloaded, and transferred via screw conveyors to an upper floor where they are cleaned and screened by a scalping screen to remove stems and stalks from incoming grain and then placed in grain storage silos and bins. Corn may also be cracked in a rotary bladed cracker/crimper or ground in a hammer mill prior to being placed in storage bins. Feed materials, including molasses, from the storage silos and bins are mixed in a mixer and the resulting mash is transferred via screw conveyors to process bins or into two (2) pellet mills where feed pellets are formed with the addition of steam. The pellets are air cooled and then transferred mechanically to product bins. From the product bins, the feed pellets are gravity fed to either a bagging operation inside the building or to a truck loading operation via canvas tubes. The truck loading area is enclosed on two sides. Process steam is provided by a natural gas fired boiler with a maximum heat input rating of less than 10 MMBtu/hour. Depending on market demand and other imponderables, products can go from the mixer, the hammer mill or other sections to finished product shipping and materials can go from the mixer, pellet mills and hammer mill to the grain storage silos and bins.

The existing facility consists of the following emissions units.

Facility ID No. 1050365	
ID No.	Emission Unit Description
002	Big Pellet Mill
004	Small Pellet Mill

Project Description and Affected Emissions Units

This project is to:

- Modify Emission Unit No. 004 by replacing its cyclone used to control particulate matter emissions with a like-kind custom fabricated cyclone.

- Make several administrative changes to Emission Unit Nos. 002 and 004, such as: 1) clarify the production rate as the feed production rate (output) and 2) the feed production rate is considered the same as the process input rate regarding Rule 62-296.320(4)(a), F.A.C. – Process Weight Table.

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

Exempt Emission Units/Activities

The following emission sources at this facility are from permitting in accordance with the provisions of Rule 62-210.300(3)(b), F.A.C. (Generic Emissions Unit or Activity Exemption) due to their low potential air pollution emissions:

- Screening/sizing operations in an enclosed area operated at approximately 4 tons per hour. This operation was previously permitted as EU 001 – Grain Cleaner;

- Hammer mill which processes corn at a maximum rate of approximately 1.5 tons/hour. This activity was previously permitted as EU 003 – Hammer mill. It typically operates 20 hour/week. The milled product is transferred pneumatically to storage bins. Particulate matter emissions are controlled by a cyclone. However the pre-control emissions are estimated at less than 3 tons per year;

- Railcar and truck raw material unloading (gravity feed);

- Raw material transfer screw conveyors;

- Corn cracker (crimper roller);

- Product bagging operation inside the building; and

- Product truck loading (gravity feed through canvas tube).

The following emission source at this facility is exempt from permitting in accordance with Rule 62-210.300(3)(a)33., F.A.C. (Categorical and Conditional Exemptions):

- One natural gas fired process steam boiler with a maximum heat input of less than 10 MMBtu/hr.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source for the pollutant PM_{10}. The emission limitations, restriction on hours of operation, the use of cyclones, and restriction on the amount of material produced in this permit will ensure that the facility's PM_{10} emissions will be below the threshold for a Title V source.

PERMIT HISTORY/AFFECTED PERMITS

- Modifies Construction Permit No. 1050365-004-AC by allowing the replacement of Emission Unit No. 004 – Small Pellet Mill's cyclone used to control particulate matter emissions with a like-kind custom fabricated cyclone.

- Cross reference with Operation Permit No. 1050365-005-AF, which has an effective date of November 4, 2009, and an expiration date of September 26, 2013.

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number).

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Unconfined Emissions of Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in Rule 62-296.320(4)(c), F.A.C. (See Appendix C, Condition No. 9). These provisions are applicable to any source, including but not limited to, industrial related activities such as loading, unloading, storing and handling of materials. These provisions shall include the following:

   a. Truck and railcar unloading of incoming raw materials shall be done in enclosed areas;

   b. Door(s) shall be shut when screening/sizing equipment is in operation on the screening floor; and

   c. Truck loading of product shall be done by gravity feed through a canvas tube.

   [Rule 62-296.320(4)(c), F.A.C.; Construction Permit 1050365-004-AC]

9. Application for Non-Title V Air Operation Permit: This permit authorizes the modification of Emission Unit No. 004 – Small Pellet Mill and its initial operation after the modification to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the modified permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

   c. a copy of the initial compliance test report(s) required by Specific Condition No. A.5. for Emission Unit No. 004 – Small Pellet Mill, if not previously submitted; and

   d. copies of the most recent month of records/logs specified in Specific Condition No. A.12.

   The application shall be submitted to the Permitting Authority.
   [Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

A. EU No. 002 – Big Pellet Mill & EU No. 004 – Small Pellet Mill

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
002	Big Pellet Mill – The maximum feed production rate (output) is 8 tons/hour based on a daily average. Particulate matter emissions from this mill are controlled by two cyclones (in parallel) exhausting to the atmosphere through a common discharge stack.
004	Small Pellet Mill – The maximum feed production rate (output) is 5 tons/hr. based on a daily average. Particulate matter emissions from this mill are controlled by a custom fabricated cyclone with a design airflow rate of approximately 5,000 acfm.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The emissions units shall comply with the following:

a. Emission Unit No. 002 – Big Pellet Mill's maximum feed production rate (output) is 8 tons/hr. based on a daily average.

b. Emission Unit No. 004 – Small Pellet Mill's maximum feed production rate (output) is 5 tons/hr. based on a daily average.

c. The maximum combined feed production rate (output) of Emission Unit No. 002 – Big Pellet Mill and Emission Unit No. 004 – Small Pellet Mill shall not exceed 52,560 tons of feed products per any consecutive 12-month period.

[Rule 62-210.200(PTE), F.A.C.]

A.2. Restricted Operation: Each of the two (2) pellet mills is limited to a maximum of 6,570 hours per any consecutive 12-month period. Each pellet mill typically operates 32-40 hours/week. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

A.3. General Particulate Matter Emission Limiting Standards (Process Weight Table) - The maximum total particulate matter emission rates from each of the pellet mill cyclone exhaust stacks shall not exceed an allowable rate as determined by the applicable Rule 62-296.320(4)(a)2., F.A.C., Process Weight Table. The maximum allowable PM emission rates based on the maximum process rates of the two pellet mills are shown in the table below.

EU No.	EU Description	Max. Process Rate (daily average)	Allowable PM Emissions
002	Big Pellet Mill	8.0 tons/hr	13.03 lbs/hr
004	Small Pellet Mill	5.0 tons/hr	9.74 lbs/hr

The allowable emission rates at lesser process rates shall be determined from the formula below:

$E = 3.59P^{0.62}$
where E = emissions in pounds per hour (lbs/hr), and
P = process weight rate in tons per hour *(and ≤ 30 tons per hour)*

{*Permitting Note: in this case, the daily production rate of feed products per pellet mill is used to determine the process weight rate "P". See Specific Condition No. A.12. for recordkeeping requirements.*}
[Rule 62-296.320(4)(a), F.A.C.]

A.4. Cyclone Exhaust Visible Emissions Standard: In order to provide reasonable assurance that the cyclones are operating properly and being properly maintained, visible emissions from the pellet mill cyclone stacks (EU Nos. 002 and 004) shall not exceed 5% opacity. Submittal of a visible emissions test showing visible emissions of no greater than 5% opacity will be accepted as documentation of compliance with the particulate matter emission limit(s) of Specific Condition No. A.3. However, should the Department have reason to believe that a particulate emission standard is not being met, the Department may require that compliance with the particulate emission standard be demonstrated by stack testing in accordance with Chapter 62-297, F.A.C.
[Rules 62-4.070(3) and 62-297.310(7)(b), F.A.C.]

TESTING REQUIREMENTS

A.5. Initial Compliance Test for Emissions Unit No. 004 – Small Pellet Mill: The custom fabricated cyclone shall be tested to demonstrate initial compliance with the visible emissions limitation required by Specific Condition No. A.4. The initial tests shall be conducted no later than 90 days after initial operation of the custom fabricated cyclone.
[Rules 62-4.070(3) and 62-297.310(7)(a)1., F.A.C.]

A.6. Compliance Tests: During each federal fiscal year (October 1st to September 30th), each of the two (2) pellet mill cyclone exhausts shall be tested to demonstrate compliance with the visible emissions standard of Specific Condition No. A.4.
[Rule 62-297.310, F.A.C.]

A.7. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. Additionally, the pellet mill's daily average feed production rate (output) shall be used to determine when additional visible emission testing is required in accordance with Condition No. 1 in Appendix D of Section 4.
[Rule 62-297.310, F.A.C.]

A.8. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rule 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.9. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.
{*Permitting Note: The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*}
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.10. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of EU No. 004 – Small Pellet Mill's custom fabricated cyclone, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rule 62-4.070, F.A.C., and Rule 62-210.200, F.A.C., (Definition of Commence Operation)]

RECORDS AND REPORTS

A.11. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. The test reports shall include:

a. The actual feed production rate (output) during the test period.

b. A copy of the daily records for the test day as required by Specific Condition No. A.12.

[Rules 62-4.070(3) and 62-297.310(8), F.A.C.]

A.12 Recordkeeping Requirements: In order to document compliance with Specific Condition Nos. A.1. and A.2., the permittee shall maintain daily and monthly records. At a minimum, the records shall contain the following:

Daily Records

a. Facility Name, Facility ID (1050365), Emission Unit No. and description (e.g., EU 002 – Big Pellet Mill);
b. Date (Month/Day/Year);
c. Tons of feed products from the big pellet mill;
d. The big pellet mill hours of operation;
e. Tons of feed products from the small pellet mill;
f. The small pellet mill hours of operation;
g. Daily average feed production rate of the big pellet mill in tons/hr., calculated from c. and d. above; and
h. Daily average feed production rate of the small pellet mill in tons/hr., calculated from e. and f. above (tons/hr).

Monthly Records

i. Facility Name, Facility ID (1050365);
j. Month and year;
k. Total production of animal feed from the facility for the month in tons;
l. Total production of animal feed for the most recent consecutive 12-month period ending with the month of record (tons per consecutiver12-month period);
m. Total hours of operation of the big pellet mill for the most recent consecutive 12-month period; and
n. Total hours of operation of the small pellet mill for the most recent consecutive 12-month period.

Daily records shall be completed within ten (10) business days and monthly records shall be completed within 15 days after the end of each month. These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained at the facility for at least a three (3) year period.
[Rule 62-4.070(3), F.A.C.]